

# Exhibit F

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

MICHAEL DAVID SILLS and MARY )  
SILLS, )

Plaintiffs, )

vs. ) No. 3:23-cv-00478

SOUTHERN BAPTIST CONVENTION, a )  
nonprofit corporation, et al., )

Defendants. )

VIDEOTAPED DEPOSITION OF DR. ERIC GEIGER  
Irvine, California  
Wednesday, October 30, 2024

Reported by:  
Heather Ayers  
CSR No. 11871  
Job No. MDLG6982715

[illegible][illegible][illegible][illegible]

1. [REDACTED]

2. [REDACTED]

3. [REDACTED]

4. [REDACTED]

5. [REDACTED]

6. [REDACTED]

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12. [REDACTED]

13. [REDACTED]

14. [REDACTED]

15. [REDACTED]

16. [REDACTED]

17. [REDACTED]

18. [REDACTED]

19. [REDACTED]

20. [REDACTED]

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23. [REDACTED]

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90. [REDACTED]

91. [REDACTED]

92. [REDACTED]

93. [REDACTED]

94. [REDACTED]

95. [REDACTED]

96. [REDACTED]

97. [REDACTED]

98. [REDACTED]

99. [REDACTED]

100. [REDACTED]

[illegible]

17 Q Do you know Rachael Denhollander?

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 Q But she's not somebody you've talked to or

25 consulted with at any point in time?

1       A   We had a -- a social media interaction, I think,  
2 one time. But -- but -- but pub- -- publicly, not  
3 privately. A public social media inter- -- interaction.  
4 But I've never met her -- I've never met Rachael  
5 face-to-face.

Category	Value (approximate percentage)
1	95
2	25
3	60
4	85
5	60
6	35
7	10
8	85
9	20
10	30
11	95
12	45
13	90
14	35
15	10
16	45
17	95
18	90
19	85
20	35
21	10
22	25
23	60
24	90
25	100

[illegible][illegible]

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1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 Okay. I want to put up Lyell 00175930.  
25 Doctor, go ahead and take a look at this tweet,

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1 and tell me when I can ask you a question.  
2 A I'm ready.  
3 (Exhibit 16 was marked for identification by the  
4 deposition officer and is attached hereto.)  
5 BY MS. MCNULTY:  
6 Q Is this -- does the document we have now marked  
7 as Exhibit 16, does this document truly and accurately  
8 reflect the tweet that you posted to social media?  
9 A I believe that it does.  
10 Q Well, when you say "I believe it does," here we  
11 go, it either does or it doesn't, or is there something  
12 that's causing you to think it -- it -- it is not your  
13 tweet?  
14 A I answered the same way that I'm answering text  
15 messages. I would -- this is something I would have said,  
16 and I'm -- I have my tweets on auto delete. So I don't  
17 think I can pull this tweet back up. But I'm not  
18 disputing that this is a tweet that I sent.  
19 Q Okay. And when did you send this tweet?  
20 A I don't see a date.  
21 MR. BARZE: If you scroll down, maybe he can see  
22 it -- or not.  
23 THE WITNESS: I do not know when I sent this  
24 tweet.  
25 BY MS. MCNULTY:

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1 Q Okay. Do you know if it was around the time that  
2 the Baptist press article came out or the Guidepost  
3 report?  
4 A I would be speculating.  
5 Q But you do know you sent out this tweet?  
6 A I believe that I sent this tweet out. But I do  
7 not have record of sending this tweet out but it -- I --  
8 I'm repeating myself.  
9 Q Yeah. So there is a tweet that was produced by  
10 Lyell in this case. And it is a screenshot of what looks  
11 like your Twitter account.  
12 Do you have that photo, or did you, at some  
13 point, have that photo associated with your Twitter  
14 account?  
15 A The photo in the top left?  
16 Q That's right, the only photo that's on this  
17 screenshot, yep.  
18 A Yes. I -- that -- that might still be my photo.  
19 Q Uh-huh. And is your --  
20 A Still my photo.  
21 Q -- Twitter handle @EricGeiger?  
22 A Yes, that is my Twitter handle.  
23 Q And did you post a -- a tweet that said, "I  
24 respect, appreciate, and care deeply for @jenlyell and  
25 grieve for her. And I know my grief is but a miniscule

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1 fraction of the pain she has endured"?  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 Q When you sent this tweet, when you posted this  
20 tweet, you understood that it would go out to -- what's  
21 colloquial referred to as the "Twitterverse"?  
22 A Yes, I did. Any tweet that I tweet, I understood  
23 that.  
24 Q Uh-huh.  
25 How many people are on Twitter?

1 A I don't know.  
2 Q More than 100?  
3 A Yes.  
4 Q More than 100,000?  
5 A Yes, but not all of those follow my feed.

6 [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

17 Q How many followers do you have?  
18 A 25,300.  
19 Q You would agree that your messages posted to  
20 Twitter are not limited to the 25,300?  
21 A I would agree that a -- a message on Twitter  
22 could -- could go beyond the 25,000, but I also would say  
23 this. There is a lot of messages that aren't seen by the  
24 25,000. So I can't speculate on how widespread this  
25 message --

[illegible][illegible][illegible]